

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CRESCENCIANO GONZALEZ,

Plaintiff,

Index No.: 20-CV-40 (DLI)(CLP)

-against-

BBKM ASSOCIATES LLC d/b/a MIRAGE DINER

and BILL KONTOLIOS,

Defendants.

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MOTION TO WITHDRAW AS COUNSEL

Valerie K. Ferrier, Esq., on behalf of herself, Edward Warnke, and the firm MARTIN CLEARWATER & BELL LLP, respectfully moves to withdraw as counsel for Defendants in the above-captioned matter, and as grounds therefore states that irreconcilable differences have arisen which make it impossible for said firm to continue its representation of Defendants. The facts and circumstances underlying this motion are fully set forth within the Affirmation of Valerie K. Ferrier, Esq., filed concomitantly herewith.

It is respectfully requested that this action be stayed for a period of at least sixty (60) days to allow Defendants to secure alternate counsel. The requested withdrawal will not prejudice any party and should not occasion any delay to the litigation. No scheduling orders have entered and there are no conferences or other dates scheduled.

WHEREFORE, Valerie K. Ferrier, Esq., of MARTIN CLEARWATER & BELL LLP, respectfully request that this Court enter an Order (i) allowing withdraw as counsel of record for the Defendants, and (ii) staying this litigation for at least sixty (60) days, to provide time for Defendants to secure alternate legal counsel.

Dated: New York, New York
July 15, 2020

Yours, etc.

MARTIN CLEARWATER & BELL LLP

By: 

Valerie K. Ferrier, Esq.
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